



ZACHARY W. CARTER
Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, N.Y. 10007

PAUL H. JOHNSON
phone: (212) 356-2656
fax: (212) 356-3509
pajohnso@law.nyc.gov

May 17, 2017

VIA ECF

Honorable Pamela K. Chen
United States District Judge
United States District Court
for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Desmon Goins v. City of New York, et al.
15-CV-7105 (PKC) (JO)

Your Honor:

I am the Assistant Corporation Counsel in the Special Federal Litigation Division of the New York City Law Department, assigned to represent Detective Radoslaw Terepka in the above-referenced matter. The parties write to jointly set a proposed briefing schedule for the parties' anticipated motion for summary judgment.

Motion papers to be served and filed: June 19, 2017;

Opposition papers to be served and filed: July 19, 2017;

Reply papers, if any to be served and filed: August 2, 2017.

The parties respectfully request that the Court review and endorse the above schedule.

Thank you for your consideration herein.

Respectfully submitted,



Paul H. Johnson
Assistant Corporation Counsel
Special Federal Litigation Division

cc: Jason Leventhal, Esq. (via ECF)
Attorney for Plaintiff
Douglas LaBarbera
Attorney for Retired Police Officer David Pralgo
Anthony DiFiore
Attorney for Sergeant Robert Martinez